

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,

Plaintiff

v.

Civil Action No.

\$42,500.00 IN UNITED STATES
CURRENCY,

\$27,380.00 IN UNITED STATES
CURRENCY,

Defendants.

VERIFIED COMPLAINT FOR FORFEITURE

AND NOW comes the United States of America, by and through its counsel, Eric G. Olshan, United States Attorney for the Western District of Pennsylvania, and April L. Cressler, Assistant United States Attorney for the Western District, and respectfully represents as follows:

1. This is a civil action *in rem* for forfeiture to the United States of the following property (the “Defendant Property”) pursuant to 21 U.S.C. § 881(a)(6):
 - a. \$42,500.00 in United States currency, further described at asset identification number 24-FBI-000785; and
 - b. \$27,380.00 in United States currency, further described at asset identification number 24-FBI-000784;
2. Jurisdiction is predicated upon 28 U.S.C. §§ 1345 and 1355(a).
3. Venue is proper under 28 U.S.C. §§ 1395 and 1355(b).
4. The Defendant Property was seized on November 17, 2023 when agents of the Federal Bureau of Investigation (“FBI”) executed federal search warrants in the Western District of Pennsylvania at the residence of David Quick (“Quick”) and Alexis Pawlowski (“Pawlowski”) on Thomas Street, Monroeville, Pennsylvania and also at a rental storage unit located at Storage

Sense, Unit 1271, 3470 William Penn Highway, Pittsburgh, Pennsylvania.

5. During October 2023, the Munhall Police Department received a tip that Quick was involved in a narcotics trafficking operation in the Pittsburgh area. The FBI opened an investigation of Quick and was able to confirm Quick's involvement in narcotics trafficking through surveillance and other investigative techniques. The investigation included positive field testing of cocaine that had been in Quick's possession.

6. In addition to the Defendant Property, the FBI also seized the following items from the residence of Quick and Pawlowski: Ledger Nano cryptocurrency wallet, paper document of how to press kilos of cocaine and how to make crack, a kilo press, a white powder substance, a baggie containing suspected cocaine, box of vape pens containing suspected THC/marijuana, numerous suspected THC/marijuana gummies and vape pens, bagged suspected THC/marijuana, honey, syrup and nuggets with price list, two rolls of PA Medical Cannabis labels, and 15 glass mason jars containing suspected marijuana.

7. According to the Pennsylvania Department of Labor and Industry Employment records, Quick had no current or recent employment, and Pawlowski's 2023 reported earnings were equivalent to approximately 30 percent of the Defendant Property.

8. Quick faces state felony charges for violations of the Controlled Substances, Drugs, Device and Cosmetic Act and illegal possession of firearms by a convicted felon, among other charges. Pawlowski faces state felony charges for violations of the Controlled Substances, Drugs, Device and Cosmetic Act, among other charges.

9. The Defendant Property was seized pursuant to 21 U.S.C. § 881(a)(6) and remains in the Western District of Pennsylvania in the custody of the United States Marshals Service.

10. Based on the above-described investigation, the FBI determined that the Defendant Property was intended to be furnished in exchange for a controlled substance and/or represents proceeds of illegal drug trafficking.

11. Subsequent to the seizure, David Quick filed a claim to the Defendant Property. As a result of the filing of his claim, the United States has instituted this civil forfeiture action against the Defendant Property.

12. By reason of the foregoing, and under the provisions of 21 U.S.C. § 881(a)(6), the Defendant Property is forfeitable to the United States because it was furnished or intended to be furnished in exchange for a controlled substance and/or constitutes proceeds traceable to an exchange for a controlled substance.

WHEREFORE, the United States of America respectfully requests that the process of warrant *in rem* issue for the arrest of the Defendant Property; that Judgment of Forfeiture be entered in favor of the United States for the Defendant Property; and that the United States be granted such relief as this Honorable Court may deem just and proper, together with the costs and disbursements of this Action.

Respectfully submitted,

ERIC G. OLSHAN
United States Attorney

/s/ April L. Cressler
APRIL L. CRESSLER
Assistant U.S. Attorney
Joseph F. Weis, Jr. U.S. Courthouse
700 Grant Street, Suite 4000
Pittsburgh, PA 15219
(412) 644-3500
april.cressler@usdoj.gov
PA ID No. 308353 (AFF)

VERIFICATION

I am a Special Agent of the Federal Bureau of Investigation, and an officer assigned responsibility for this case. I have read the contents of the foregoing complaint for forfeiture and the statements contained therein are true and correct to the best of my knowledge and belief.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on this 15th day of April, 2024.



ANGELA M. BRONSON, Special Agent
Federal Bureau of Investigation